

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

ZUNUM AERO, INC.,

Plaintiff

v.

THE BOEING COMPANY; BOEING
HORIZONX VENTURES, LLC,

Defendants.

Case No. 2:21-cv-00896-JLR

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER ON SEALING**

NOTED ON MOTION CALENDAR:
May 17, 2024

Pursuant to this Court’s Minute Entry dated May 15, 2024 (Dkt. 637, the “Minute Entry”), Plaintiff Zunum Aero, Inc. (“Zunum”) and Defendants The Boeing Company and Boeing HorizonX Ventures, LLC (“Boeing”) (collectively, the “Parties”), hereby submit this Joint Stipulation and Proposed Order (“Joint Stipulation”).

WHEREAS, pursuant to the Minute Entry, the parties must file a joint stipulated motion and proposed order regarding sealing no later than 5/17/2024;

WHEREAS, the Parties have conferred regarding their collective sealing requests in Dkts # 608 and 627;

WHEREAS, the Parties have conferred as to whether the following documents should remain under seal, be filed in redacted form, or be unsealed;

WHEREAS, in entering this Joint Stipulation, the Parties do not concede that any party's "Confidential" or "Highly Confidential – Attorneys' Eyes Only" materials or information do, in fact, contain that party's confidential information. The Parties expressly reserve the right to argue that any material or information does not contain confidential information and should not have been designated as "Confidential" or "Highly Confidential – Attorneys' Eyes Only" under the Stipulated Protective Order.

NOW, THEREFORE, the Parties respectfully propose that the following documents should remain under seal, be filed in redacted form, or be unsealed, as specified in the right-hand column below:

Docket 608: Boeing's Motion to Seal Boeing's Trial Brief			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 612] Boeing's Trial Brief	Redact	N/A	Redact

Docket 627: Boeing's Motion to Seal Boeing's Position Regarding Joint Statement Regarding Trade Secret Definitions and Exhibits thereto			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 628] Boeing's Statement Regarding Trade Secret Definitions and Exhibits thereto	Redact	N/A	Redact
[Dkt. 628, Att. 1] Exhibit A to Boeing's Statement Regarding Trade Secret Definitions and Exhibits thereto	Seal entirely	N/A	Seal Entirely

Dated: May 17, 2024

By: /s/ Scott M. Danner

Scott M. Danner, NY Bar #4853016
(admitted *pro hac vice*)
Brian T. Goldman, NY Bar #5616891
(admitted *pro hac vice*)
Charlotte Baigent, NY Bar #5979224
(admitted *pro hac vice*)
**HOLWELL SHUSTER &
GOLDBERG LLP**
425 Lexington Avenue, 14th Floor
New York, New York 10017
Telephone: (646) 837-8530
sdanner@hsgllp.com
bgoldman@hsgllp.com
cbaigent@hsgllp.com

Steven W. Fogg
CORR CRONIN LLP
1015 Second Ave, 10th Floor
Seattle, WA 98104
(206) 625-8600
sfogg@corrchronin.com

Counsel for Plaintiff

By: /s/ Yegor Fursevich

John C. Hueston
(Admitted *Pro Hac Vice*)
Email: jhueston@hueston.com
Moez M. Kaba
(Admitted *Pro Hac Vice*)
Email: mkaba@hueston.com
Yegor Fursevich
(Admitted *Pro Hac Vice*)
Email: yfursevich@hueston.com
Justin M. Greer
(Admitted *Pro Hac Vice*)
Email: jgreer@hueston.com
Cassidy O'Sullivan
(Admitted *Pro Hac Vice*)
Email: cosullivan@huston.com
HUESTON HENNIGAN LLP
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340
Facsimile: (888) 866-4825

David A. Perez, WSBA No. 43959
Susan E. Foster WSBA No. 18030
Madeline D. Swan WSBA No. 56355
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101
(206) 359-8000
214-969-5100 (fax)
makairis@jonesday.com

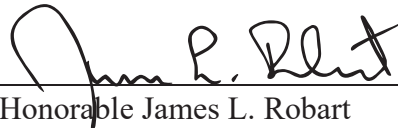
Counsel for Defendants

~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED THAT, pursuant to the Parties' Joint Stipulation, and for compelling reasons shown: Dkt. 612 shall remain as redacted on the public docket, and Dkt. 628 shall remain under seal. The parties shall file a redacted version of Dkt. 628 within seven (7) days of this Order.

IT IS SO ORDERED.

DATED this 17th day of May, 2024.

A handwritten signature in black ink, appearing to read "James L. Robart", is written over a horizontal line.

The Honorable James L. Robart
United States District Judge